

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Javier Cesario and
Fernando Martinez,

Case No. 07 Civ. 8545 (LLS)

Plaintiffs,

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

-against-

BNI Construction, Inc.,
Mikial Abdur-Rahim and
Musa Last Name Unknown,

Defendants.

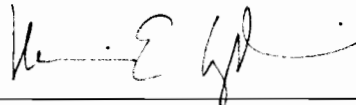
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Kerin E. Coughlin, a member in good standing of the bar of this Court and counsel for plaintiffs Javier Cesario and Fernando Martinez, hereby move for an Order allowing the admission pro hac vice of:

Laura C. Fentonmiller
Constantine Cannon LLP
1627 Eye Street, NW, 10th Floor
Washington, DC 20006
Phone: (202) 204-3500
Fax: (202) 204-3501

Laura C. Fentonmiller is a member in good standing of the Bar of the District of Columbia. There are no pending disciplinary proceedings against Ms. Fentonmiller in any State or Federal court.

Dated: October 26, 2007
City, State: New York, New York

Respectfully submitted,



Kerin E. Coughlin
Constantine Cannon LLP
450 Lexington Avenue, 17th Floor
New York, New York 10017
Phone: (212) 350-2700
Fax: (212) 350-2701

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Javier Cesario and
Fernando Martinez,

Case No. 07 Civ. 8545 (LLS)

Plaintiffs,

**Affidavit of Kerin E. Coughlin
In Support of Motion to Admit
Counsel Pro Hac Vice**

-against-

BNI Construction, Inc.,
Mikial Abdur-Rahim and
Musa Last Name Unknown,

Defendants.

State of New York)
)
County of New York) ss:

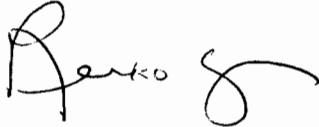
Kerin E. Coughlin, being duly sworn, hereby deposes and says as follows:

1. I am an attorney at Constantine Cannon LLP, counsel for plaintiffs Javier Cesario and Fernando Martinez in the above-captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiffs' motion to admit Laura C. Fentonmiller as counsel pro hac vice to represent them in this matter.
2. I am a member in good standing of the bar of the State of New York where I was admitted to practice law on October 22, 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Laura C. Fentonmiller since 2006.
4. Ms. Fentonmiller is an attorney at Constantine Cannon LLP in Washington, DC.
5. I have found Ms. Fentonmiller to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of Laura C. Fentonmiller, pro hac vice.

7. I respectfully submit a proposed Order granting the admission of Laura C. Fentonmiller, pro hac vice, which is attached hereto as Exhibit A.

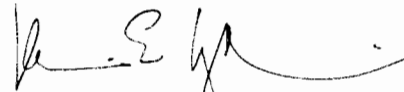
WHEREFORE it is respectfully requested that the motion to admit Laura C. Fentonmiller, pro hac vice, to represent plaintiffs Javier Cesario and Fernando Martinez in the above-captioned matter be granted.

Dated: October 26, 2007
City/State: New York, New York
Notarized:



REIKO CYR
Notary Public, State of New York
No. 02CY6103235
Qualified in New York County
Commission Expires 12/22/2007

Respectfully submitted,



Kerin E. Coughlin

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Javier Cesario and
Fernando Martinez,

Case No. 07 Civ. 8545 (LLS)

Plaintiffs,

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

-against-

BNI Construction, Inc.,
Mikial Abdur-Rahim and
Musa Last Name Unknown,

Defendants.

Upon the motion of Kerin E. Coughlin, attorney for plaintiffs Javier Cesario and Fernando Martinez, and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Laura C. Fentonmiller
Constantine Cannon LLP
1627 Eye Street, NW, 10th Floor
Washington, DC 20006
Phone: (202) 204-3500
Fax: (202) 204-3501
lfentonmiller@constantinecannon.com

is admitted to practice pro hac vice as counsel for plaintiffs Javier Cesario and Fernando Martinez in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge

United States Court of Appeals
FOR THE DISTRICT OF COLUMBIA CIRCUIT

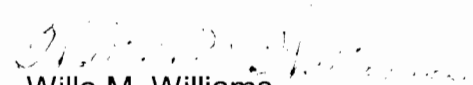
Certificate of Good Standing

I, Mark J. Langer, Clerk of the United States Court of Appeals for the District of Columbia Circuit, certify that LAURA C. FENTONMILLER, was on the 29TH day of DECEMBER, 1999, duly admitted and qualified as an attorney and counselor of the Court of Appeals, and is now a member of the bar of the Court of Appeals in good standing. I further certify that no grievances have been filed, in this Court, against this attorney since the date of admission.

In Testimony Whereof, I have hereunto
subscribed my name and affixed the seal
of the Court, at the City of Washington,
this 10 day of October, 2007.

FOR THE COURT:
Mark J. Langer, Clerk

BY:


Willa M. Williams
Deputy Clerk